## IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF PUERTO RICO

IN RE:

CASE NO. 14-02177-MCF

ROBERT FRANCIS LOPEZ ACEVEDO

**CHAPTER 13** 

**DEBTOR** 

## DEBTOR'S REPLY TO MOTION TO DISMISS FILED BY SCOTIABANK PUERTO RICO DOCKET #58

## TO THE HONORABLE COURT:

COMES NOW, ROBERT FRANCIS LOPEZ ACEVEDO, debtor in the above captioned case, through the undersigned attorney, and very respectfully states and prays as follows:

- 1. On June 22, 2015, Scotiabank Puerto de Rico ("Scotiabank") filed a *Motion to Dismiss*, docket #58, basically alleging that the debtor is in arrears in three (3) post-petition mortgage loan payments to Scotiabank.
- 2. The debtor met with the undersigned attorney regarding this matter and respectfully submits that he did incur in post-petition arrears with Scotiabank due to certain economic problems.
- 3. The debtor respectfully submits that he is up to date in his mortgage loan payments with Scotiabank. On June 16, 2015, he made three (3) \$768.00 payments, for a total sum of \$2,304.00, in order to cure the arrears owed to Scotiabank. Attached is evidence of the payments made by the debtor to Scotiabank.

WHEREFORE, debtor respectfully requests this Honorable Court Order deny the Motion to Dismiss filed by Scotiabank, docket #58.

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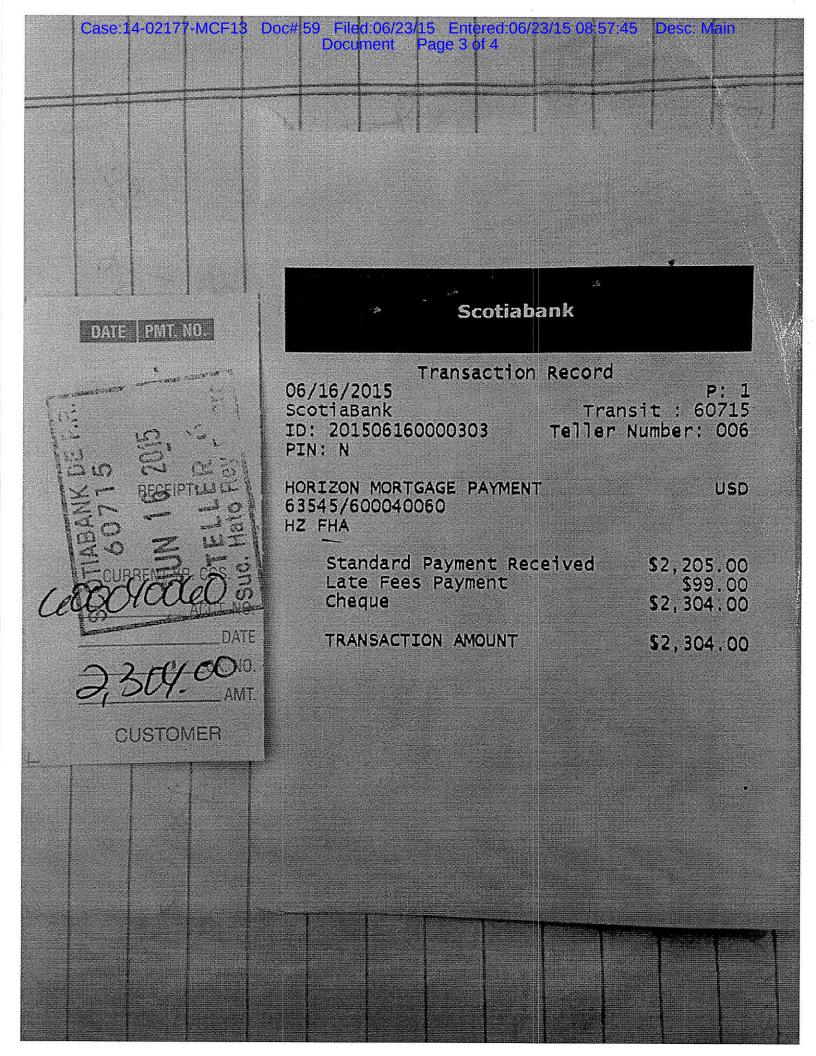
Debtor's Reply to Motion to Dismiss

Case no. 14-02177-MCF13

I CERTIFY that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF system which will send notice of the same to: the Chapter 13 Trustee; Jose F. Cardona Jimenez, Esq., Counsel for Scotiabank; I also certify that a copy of this motion was sent via US Mail to Robert Francis Lope Acevedo, debtor in the above captioned case.

**RESPECTFULLY SUBMITTED**. In San Juan, Puerto Rico, this 23<sup>rd</sup> day of June, 2015.

/s/Roberto Figueroa Carrasquillo ROBERTO FIGUEROA CARRASQUILLO USBC #203614 ATTORNEY FOR PETITIONERS PO BOX 186 CAGUAS PR 00726 TEL 787-744-7699 FAX 787-746-5294 Email: rfiqueroa@rfclawpr.com



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